IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

JONATHAN LANGLEY,	
Plaintiff,)
v.) Case No. 1:18-cv-00443-L
INTERNATIONAL BUSINESS MACHINES CORPORATION,)
Defendant.)
	,

UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT

Defendant International Business Machines Corporation ("IBM" or "Defendant") moves for an extension of time, until July 12, 2018, to file a response to Plaintiff Jonathan Langley's Complaint. In support of this Unopposed Motion, IBM states as follows:

- 1. Plaintiff filed his Complaint on May 25, 2018. (ECF No. 1.)
- 2. Plaintiff served his Complaint on Defendant on May 31, 2018. Therefore, IBM's response to Plaintiff's Complaint is due on June 21, 2018.
- 3. IBM's counsel needs additional time to review the Complaint's allegations and to investigate the facts of the case in order to respond to Plaintiff's Complaint.
- 4. IBM's counsel conferred with Plaintiff's counsel on June 15, 2018, and Plaintiff's counsel does not oppose this motion for an extension.
- 5. Accordingly, IBM requests an additional twenty-one (21) days to respond to Plaintiff's Complaint, on or before July 12, 2018.
- 6. This is the first Motion for Extension of Time filed in this case, and granting it will not cause undue delay or unduly prejudice either of the Parties.

Therefore, IBM respectfully requests that the Court grant this Unopposed Motion and permit IBM until July 12, 2018 to answer or otherwise respond.

Dated: June 18, 2018 Respectfully submitted,

/s/ Brian M. Jorgensen

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*Motion for Admission Pro Hac Vice forthcoming

Attorneys for Defendant International Business Machines Corporation **CERTIFICATE OF CONFERENCE**

Counsel for Defendant has complied with the Court's meet and confer requirement. On

June 15, 2018, IBM Counsel conferred via email with Heidi Coughlin regarding the extension

sought in this Motion. Counsel responded that Plaintiff is not opposed to the relief sought in this

Motion.

/s/ Brian M. Jorgensen

Brian M. Jorgensen

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2018, I electronically filed the foregoing UNOPPOSED

MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO

PLAINTIFF'S COMPLAINT with the Clerk of Court using the CM/ECF system, which sent

notification of such filing to the Court and Plaintiff's counsel.

/s/ Brian M. Jorgensen

Brian M. Jorgensen

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